

August 12, 2020

The Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

RE: Joint letter seeking extension of time in *State of New York v. Wolf, et al.*, 20 Civ. 1127, and *Lewis-McCoy v. Wolf, et al.*, 20 Civ. 1142.

Dear Judge Furman,

Together, the parties respectfully write to request a two-week extension of the Court's deferral of action on Plaintiffs' unopposed cross-motion for summary judgment, ECF No. 96, from today, August 12, 2020, to August 26, 2020. The parties continue to engage in good-faith settlement negotiations, but do not anticipate reaching a final resolution today. Accordingly, the parties agree that they would benefit from a two-week extension of time. We thank the Court for its consideration of this request.

Respectfully submitted,

LETITIA JAMES  
*Attorney General of the State of New York*


By: /s/ Daniela L. Nogueira  
Daniela L. Nogueira, *Assistant Attorney General*  
Matthew Colangelo, *Chief Counsel for Federal Initiatives*  
Elena Goldstein, *Deputy Chief, Civil Rights Bureau*  
Office of the New York State Attorney General  
28 Liberty Street  
New York, NY 10005  
Phone: (212) 416-6544  
daniela.nogueira@ag.ny.gov

Attorneys for Plaintiff in 20 Civ. 1127

NEW YORK CIVIL LIBERTIES UNION FOUNDATION

By: /s/ Antony P.F. Gemmell  
Antony P.F. Gemmell  
Molly K. Biklen  
Jessica Perry  
Jordan Laris Cohen  
Christopher T. Dunn  
125 Broad Street, 19th Floor

Application GRANTED. The parties are warned, however, that further extensions are unlikely to be granted. The Clerk of Court is directed to terminate 20-CV-1127, ECF No. 104 and 20-CV-1142, ECF No. 102. SO ORDERED.



August 12, 2020

New York, NY 10004  
212-607-3300  
agemmell@nyclu.org

Attorneys for Plaintiffs and the Class in 20 Civ. 1142

AUDREY STRAUSS  
Acting United States Attorney for the  
Southern District of New York

By: /s/ Zachary Bannon  
ZACHARY BANNON  
ELIZABETH KIM  
CHRISTOPHER CONNOLLY  
Assistant United States Attorneys  
86 Chambers St. 3<sup>rd</sup> Floor  
New York, New York 10007  
Tel.: 212-637-2728, 2745, 2761  
Fax: 212-637-2717  
E-mail: Zachary.Bannon@usdoj.gov  
Elizabeth.Kim@usdoj.gov  
Christopher.Connolly@usdoj.gov

Attorneys for the Defendants